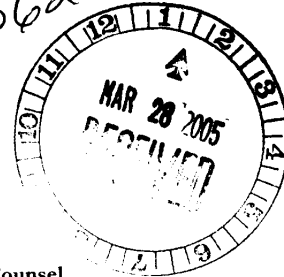


2/3628

**John F. McHugh**  
Attorney at Law  
6 Water Street, Suite 401  
New York, NY 10004



Phone: (212) 483-0875  
Fax: (212) 483-0876

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Of Counsel  
W. Patrick Quast  
164 Franklin Tpk.,  
Waldwick, N.J. 07463,  
201-444-5990  
Fax 201-444-5094

March 25, 2005

The Honorable Vernon A. Williams  
Secretary, Surface Transportation Board  
Mercury Building, Room 700  
1925 K Street, N.W.  
Washington, D.C. 20423

Re: New England Transrail, LLC, d/b/a Wilmington & Woburn  
Terminal Railway-Petition for Exemption-Construction and  
Operation as a rail carrier on tracks and lands acquired  
from Olin Corporation.  
FD 34391

Dear Mr. Williams:

The National Solid Waste Management Association filed a reply dated March 17, 2005. The submission is not allowed under the rules and the reply does not add information which was not available at the time of the Association's petition or indeed anything but a more detailed assertion of the same arguments.

The petitioners simply seek to restate the obvious. The services to be performed by NET with regard to waste and to all commodities, facilitate efficient use of rail cars, a necessity as railway equipment is expensive. Those services have value. However, contrary to the petitioner's assertions, those services do not add value to any cargo beyond reducing transportation costs.

The reply of the National Solid Waste Management Association should not be considered by the Board as it fails to meet the standards for relaxing the rules.

Thank you for your attention to this matter.

Very truly yours

John F. McHugh

Cc; Deutch Williams  
99 Summer Street  
Boston, MA 02110-1213

Margaret Stolfa, General Counsel  
Commonwealth of Massachusetts  
Executive Office of Environmental Affairs  
Department of Environmental protection  
One Winter Street  
Boston, MA 02105

Beveridge & Dimond, P.C.  
45 William Street  
Wellesley, MA 02481-4044

Sylvia Cruz certifies under penalty of perjury pursuant to 28 U.S.C. § 1746 that on this 25<sup>th</sup> day of March, 2005 I served copy of letter on:

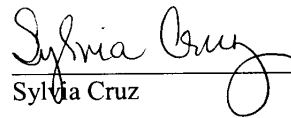
Deutch Williams  
99 Summer Street  
Boston, MA 02110-1213

Margaret Stolfa, General Counsel  
Commonwealth of Massachusetts  
Executive Office of Environmental Affairs  
Department of Environmental Protection  
One Winter Street  
Boston, MA 02105

Beveridge & Dimond, P.C.  
45 William Street  
Wellesley, MA 02481-4044

By regular United States mail.

Dated, New York, NY  
March 25, 2005

  
Sylvia Cruz